

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as a candidate for U.S. Senate, ANDY KIM FOR NEW JERSEY, SARAH SCHOENGOOD, SARAH FOR NEW JERSEY, CAROLYN RUSH and CAROLYN RUSH FOR CONGRESS;

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in her official capacity as Monmouth County Clerk, et al.,

Defendants.

- and -

DALE A. CROSS, in his official capacity as Salem County Clerk, et al.

As Interested Parties.

Civ. Action. No.: 3:24-cv-1098 (ZNQ)(TJB)

**NOTICE OF MOTION *IN LIMINE* NO.  
4 TO EXCLUDE EXPERT  
TESTIMONY FROM DR. SAMUEL S.-  
H. WANG PURSUANT TO FED. R.  
EVID. 702**

To All Counsel of Record:

**PLEASE TAKE NOTICE** that, upon the accompanying brief, defendants Christopher J. Durkin, Joanne Rajoppi, and Danielle Ireland-Imhof (“Defendants”), in their official capacity as County Clerks for Essex, Union, and Passaic Counties, respectively, by and through their undersigned attorneys, will move before the Hon. Zahid N. Quraishi, U.S.D.J., on March 18, 2024, for an Order, *in limine*, to exclude expert testimony from Dr. Samuel S.-H. Wang pursuant to Fed. R. Evid. 702.

Respectfully submitted,

Dated: March 18, 2024

**GENOVA BURNS LLC**

By: /s/ Angelo J. Genova  
Angelo J. Genova, Esq.  
Rajiv D. Parikh, Esq.  
Jennifer Borek, Esq.  
494 Broad Street  
Newark, New Jersey 07120  
Tel: 973-533-0777  
[jborek@genovaburns.com](mailto:jborek@genovaburns.com)  
[agenova@genovaburns.com](mailto:agenova@genovaburns.com)  
[rparikh@genovaburns.com](mailto:rparikh@genovaburns.com)  
*Attorneys for Defendants*  
*Christopher Durkin, Joanne Rajoppi, and*  
*Danielle Ireland-Imhof*